

# PUBLIC SUBMISSION

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**Docket:** EPA-R08-OW-2019-0512

Request for Public Comments Regarding the Revised Dewey-Burdock Uranium In-Situ Recovery Underground Injection Control Permits in Edgemont, South Dakota

**Comment On:** EPA-R08-OW-2019-0512-0017

Request for Public Comment

**Document:** EPA-R08-OW-2019-0512-DRAFT-0077

Comment on EPA-R08-OW-2019-0512-0017

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## Submitter Information

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## General Comment

See attached file(s)

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## Attachments

Dewey-Burdock UIC extension letter



New Mexico  
Environmental Law Center

Ms. Valois Robinson  
U.S. EPA Region 8  
Mail Code: 8WD-SDU  
1595 Wynkoop Street  
Denver, CO. 80202-1129

VIA ELECTRONIC MAIL

September 10, 2019

RE: EXTENSION REQUEST of Public Comment on Docket ID: EPA-R08-OW-2019-0512  
Agency: Environmental Protection Agency (EPA)

Dear Ms. Robinson:

On behalf of the New Mexico Environmental Law Center, I am emailing you today to urge the EPA to extend the Public Comment deadline on the Dewey-Burdock underground injection control permits. I request that you extend this deadline by an additional 90 days based on the fact that (according to an EPA document) Powertech was made aware of this upcoming public comment schedule well over 6 months ago, and that according to the EPA notice there is now additional items added to this public comment, which include; **1. the identification of traditional cultural properties, 2. options for approval of the aquifer exemption, and 3. a revised draft environmental justice analysis.**

The applicant, Powertech, was given ample notice to review these new documents, gather information and/or lobby on these new substantive issues. Giving the applicant significantly more time than the public to address these new issues fundamentally undermines the public participation requirements of the Safe Drinking Water Act and longstanding EPA policy. Moreover, the population most affected by the proposed Dewey-Burdock uranium project is an environmental justice population, as defined by EPA environmental justice guidance. Failing to allow for adequate time to respond to the new information related to Powertech's UIC application violates the EPA's environmental justice guidance as well as Executive Order 12,898.

I thank you in advance for your fair and equal time consideration on this request for an addition 90 days.

Sincerely,

  
Douglas Meiklejohn  
Executive Director

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